

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

INEOS FLUOR AMERICAS LLC,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 06-189-SLR
	:	
HONEYWELL INTERNATIONAL INC.,	:	
	:	
Defendant.	:	

**SECOND AMENDED NOTICE OF DEPOSITION
OF HONEYWELL INTERNATIONAL INC.**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, plaintiff INEOS Fluor Americas LLC shall take the deposition upon oral examination of defendant Honeywell International Inc. by and through its employee John Grant, Sales Leader for Industrial Product Sales, 101 Columbia Road, Morristown, New Jersey, commencing at 9:00 a.m. on December 18, 2006 at the offices of Axinn, Veltrop & Harkrider LLP, 1370 Avenue of the Americas, 14th Floor, New York, New York 10019. The deposition shall continue until completed and shall be recorded stenographically before an officer appointed or designated as specified in Rule 28 of the Federal Rules of Civil Procedure.

In accordance with Rule 30(b)(5) of the Federal Rules of Civil Procedure, the witness is requested to produce at his deposition each document in his possession, custody, or control, including without limitation correspondence, electronic mail, and calendar entries, that refers to, relates to, or reflects:

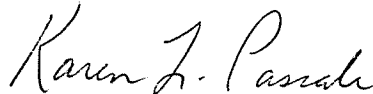
1. The termination, expiration, renewal, or replacement of the HF Contract between Allied-Signal Inc. and ICI Americas Inc. dated as of November 30, 1989 for the supply of HF (the "1989 Contract").

2. Negotiations for or discussions concerning any HF supply agreement between (a) INEOS and Honeywell or (b) Honeywell and Quimica Fluor.
3. Any "hardship provision" in the Heads of Agreement or a new HF supply agreement between INEOS and Honeywell.
4. Honeywell's increase of the price of HF to be supplied to INEOS in 2006.
5. Any meeting, correspondence, or contract between or among Honeywell, Quimica Fluor, or INEOS that refers to, relates to, or reflects HF.

You are invited to attend and examine the witness.

November 30, 2006

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CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on November 30, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

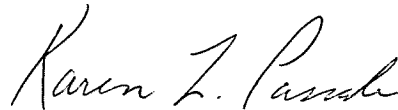
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I further certify that on November 30, 2006, I caused a copy of the foregoing document to be served by hand delivery and e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

By E-Mail and First Class U.S. Mail

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